

### REMARKS

We have amended the claims to more particularly point out and distinctly claim the invention. Following entry of the amendments presented herein, claims 1-19 will be pending in this application.

The Examiner rejected Claims 1-19 under 35 U.S.C. § 103(a) as being unpatentable over Strong (U.S. Pat. No. 6,167,523) in view of Underwood (U.S. Pat. No. 7,100,195). The Examiner admits that Strong does not explicitly teach a markup language tag for instantiating a validation manager. To supply that which is missing, the Examiner relies on Underwood. We believe, however, that Strong is missing more than what the Examiner has recognized.

The Examiner says that Strong teaches instantiating a validation manager in response to processing the markup language file and sending a programmatic event to the validation manager in response to receiving text input to the GUI element. In support of this, the Examiner directs our attention to the following passages:

When the data 290 is received by the server 205, it is transmitted ... to the form data validation and processing program 255. Once the data 290 is received, the form data validation and processing program 255 controls data validation, error reporting and processing of the input data; [emphasis added] (Col. 7, lines 23-50).

and

...entry of data into the form 280, the form 280 is submitted by the client PC 200 user by clicking on the submit button 325 ... submitting the form causes data 290 from the form including input data entered into the form to be transmitted from the client PC 200 to the server 205 ... When the data 290 is received by the server 205 ... the form data validation and processing and processing program 255 controls data validation... [emphasis added] (Col. 7, lines 5-41)

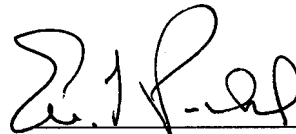
We note, however, that claim 1 has been amended to make clear that the various recited steps take place at the client computer. As the above passages from Strong reveal, Strong's validation mechanism takes place on the server side, not on the client side. More specifically, Strong's system validates text inputs to a form after the form has been filled in at the client and after it has been submitted to a server. Strong's validation of input received by the client process takes place at the server and is in response to the submission of the form.

For the reasons stated above, we believe that the claims are allowable and therefore ask the Examiner to allow them to issue.

Please apply any charges not covered, or any credits, to Deposit Account No. 08-0219.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read "E. L. Prah", written over a horizontal line.

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